

26 Oct 2007

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To: BLM Superintendent, Western Oregon Region

Hello, I am writing concerning the Draft Environmental Impact Study of the Western Oregon Plan Revisions or WOPR. I understand that Alternative #2 is the "preferred alternative". Alt. 2 decreases old-growth forest protection and aquatic habitats/drainages protection, this legally conflicts with the Northwest Forest Plan, Endangered Species Act, Clean Water Act as well as Oregon State water quality standards.

Forest Management per Alt 2 will likely make forests less flexible and able to recover from fire due to clear cutting and replacement by too few species which results in a monoculture more susceptible to disease/insects and thus more likely to have die-offs and fires of a more intense nature. This is a risk to neighboring state, USFS, and private forest lands, as well as communities/towns.

Over 1000 miles of new roads are proposed which will hugely reduce stream buffers, lead to sedimentation of streams which negatively impact water supply to humans and fish habitat (salmon, trout, chub, minnow, insect larvae that feed fish).

The proposed 140,000 acres of clear cutting and replanting in the first 10 yrs will not meet the requirements of a "sustained yield" as specified in the Owl C Act.

Economically, Alt 2 overestimates local regional and global gains when public land timber is harvested (fleecing the market) and underestimates the loss due to later fire, flooding, soil erosion, timber loss and fisheries losses.

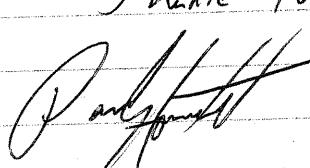
In terms of fire, old growth is much more resistant to fire and benefits from ground cover low intensity fire and thus protecting (not cutting) remaining old growth makes sense. Thinning tree farms and 2nd/3rd growth areas of higher tree and fuel density makes more sense economically and for fire protection and improving wildlife habitat. (over)

To Really improve economic gains, I would suggest thinning crowded forests of 2/3<sup>rd</sup> growth (and otherwise) and use those trees to supply what market demand they can meet and adopt a long term goal and strategy to over time convert more acres to old growth conditions (yes, Long term). This will over time bring more valuable large trees that actually have real value for lumber and not just pulp fiber use. Real wood is more valuable in long term pragmatics than either disposable paper products and inferior products like particle-board. Pulp fiber can be much faster, cheaper, and better supplied by fibrous plants; forests converted to paper is wasteful by comparison in terms of time, money, acreage and materials.

On a personal note, my wife, friends and family and myself have all enjoyed hunting, fishing and backpacking all over Oregon but some of our favorite places are in South West Oregon and the Coast Range forests. The sheer number of different plants, trees, insects and wildlife in south west Oregon in the Siskiyous region is like no place else on earth cool damp Coast Range forests. Much of where we have been was BLM land (as well as state, USFS, w/private forests). We would like to see the character of these lands preserved for the future and part of this is through better logging practices, not just more logging for unsustainable quick profit for a very few as proposed by Bush administration guidelines.

Thank You Very Much,

Paul T. Howard



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